## 13-01340-scc Doc 113 Filed 09/25/15 Entered 09/25/15 09:24:53 Main Document Pg 1 of 1 JONES DAY

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September 24, 2015

## **BY EMAIL AND HAND**

The Honorable Shelley C. Chapman U.S. Bankruptcy Court for the Southern District of New York One Bowling Green New York, New York 10004-1408

Re: <u>Lehman Bros. Holdings Inc. v. Intel Corp.</u>, Adv. Proc. No. 13-01340 (SCC)

Dear Judge Chapman:

We represent plaintiffs Lehman Brothers Holdings Inc. and Lehman Brothers OTC Derivatives Inc. (collectively, "Lehman") in this adversary proceeding. We write in connection with the Court's Proposed Findings of Fact and Conclusions of Law, entered September 16, 2015 (Doc. No. 110) ("Proposed Findings"). Rule 9033(b) of the Federal Rules of Bankruptcy Procedure provides that any party may serve and file written objections to the Proposed Findings within 14 days (that is, by September 30, 2015). Rule 9033(c) further provides that a party may request, and the Court may grant, an extension of up to 21 days to serve and file such objections. *See* Fed. R. Bankr. P. 9033(c).

Lehman and Intel Corp. are each considering their respective courses of action in connection with any objections to the Proposed Findings and responses thereto. To allow counsel and their clients sufficient time to do that, Lehman and Intel have agreed to a 21-day extension of time to submit any objections to the Proposed Findings and a 21-day extension of time to submit a response to an objection.

We therefore request that the Court "so order" the following schedule: (i) any objection to the Proposed Findings is due to be submitted by October 21, 2015; and (ii) a response to any objection is due by November 25, 2015.

Respectfully submitted, /s/ Jayant W. Tambe
Jayant W. Tambe

SO ORDERED: 9/24/15 /S/ Shelley C. Chapman US BANKRUPTCY JUDGE

Cc: John J. Buckley, Jr., Esq. (by email)